

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

vs.

DONALD J. TRUMP, *et al.*,

Defendants.

**Case No. 23-80101-CR
CANNON/REINHART**

**PRESIDENT DONALD J. TRUMP’S NOTICE OF FILING OF
ADDITIONAL EVIDENCE**

Pursuant to the Court’s June 24, 2024 Order and Minute Entry, ECF No. 643, President Donald J. Trump respectfully submits this Notice with additional evidence and exhibits in support of his opposition to the Special Counsel’s Motion for Modification of Conditions of Release, ECF No. 592. Moreover, President Trump respectfully requests leave to file a response to the expected Notice to be filed tonight by the Special Counsel’s Office. *See* 6/24/2024 Tr. at 27 (“If the defense requests an opportunity to file additional briefing, then you should make that very clear in -- in any response that you file to the motion for additional evidence.”). The defense conferred with the Special Counsel’s Office today and understands that the Special Counsel intends to file numerous exhibits not previously relied upon in seeking its Motion for Modification of Conditions of Release. President Trump respectfully requests two weeks to file a response to the newly submitted evidence.

The following exhibits, which were published in the days and weeks preceding President Trump’s August 4, 2023 post on Truth Social, *see* ECF No. 638 at Ex. 5, are arranged in

chronological order and offered as evidence in support of President Trump's opposition to ECF No. 592:

- Attached as Exhibit 1, Alex Isenstadt, *Conservative Group Plans Anti-Trump Ad Blitz In Early States*, POLITICO (July 10, 2023, 4:30 a.m.), <https://www.politico.com/news/2023/07/10/anti-trump-ads-iowa-south-carolina-00105338> (“A new group with ties to the anti-tax Club for Growth is launching a multimillion-dollar ad campaign in key early primary states aimed at stopping Donald Trump from steamrolling to the Republican nomination. The group, Win it Back, will on Tuesday begin airing TV commercials in Iowa and South Carolina. The new super PAC is spending \$3.6 million on the blitz, which will run through the end of the month.”).
- Attached as Exhibit 2, Manu Raju & Alayna Treene, *Trump's Maneuvering In Key States Buys Senate GOP Amid Feud With Conservative Group*, CNN (July 19, 2023, 1:43 p.m.), <https://www.cnn.com/2023/07/19/politics/trump-senate-races-2024/index.html> (“Senior Republicans believe they can stay aligned with Trump in part because they now have a common foe: The Club for Growth, an anti-tax group whose leader has sparred with the former president and is raising millions to help [Rep. Alex] Mooney and could potentially back [Rep. Matt] Rosendale as well.”).
- Attached as Exhibit 3, Bill Allison, *Billionaire Jeff Yass Gives \$10 Million To Group Seeking Trump Alternative*, BLOOMBERG (July 20, 2023, 3:08 p.m.), <https://www.bloomberg.com/news/articles/2023-07-20/billionaire-jeff-yass-gives-10-million-to-anti-trump-group> (“Billionaire Jeff Yass donated \$10 million to the super PAC arm of Club for Growth, a pro-business, anti-tax organization that's looking for an alternative to former President Donald Trump to be the Republican presidential nominee.”).
- Attached as Exhibit 4, Mabinty Quarshie, *Anti-Trump Super PAC Calls For “Fresh Blood” at Top of GOP*, WASH. EXAM’R (July 25, 2023, 3:08 p.m.), <https://www.washingtonexaminer.com/news/2571907/anti-trump-super-pac-calls-for-fresh-blood-at-top-of-gop-ticket-in-new-ad/> (“The Win it Back PAC, a group with close ties to the conservative Club for Growth,” was “formed to prevent former President Donald Trump from winning the Republican presidential nomination in 2024 [and] is up with an ad in two early-nominating states highlighting ‘Trump fatigue’ among GOP voters.”).
- Attached as Exhibit 5, Alexandra Marquez, *Anti-Trump Group To Spend \$1.5 Million Against Him In Iowa*, NBC NEWS (July 26, 2023, 1:22 p.m.), <https://www.nbcnews.com/meet-the-press/meetthepressblog/anti-trump-group-spend-15-million-iowa-rcna96451> (“The Republican Accountability PAC, a group that opposes former President Donald Trump group, said Wednesday it plans to spend \$1.5

million on a new ad campaign in Iowa, where it's currently advocating for a "baggage-free GOP."").

- Attached as Exhibit 6, Brian Schwartz, *Trump's \$100 Million PAC Has Burned Through Nearly All of Its Cash*, CNBC (Aug. 1, 2023, 1:09 p.m.), <https://www.cnbc.com/2023/08/01/donald-trumps-100-million-pac-has-just-3point6-million-in-cash.html> ("[Chris] Christie told CNBC 'we have' when asked if he had met with billionaire industrialist Charles Koch. The Koch Industries-funded Americans for Prosperity Action raised over \$70 million in the first half of the year and is spending some of that budget against Trump in the primary.").
- Attached as Exhibit 7, Rick Klein, *Trump's Rivals Hope For Voter "Fatigue" As His Legal Woes Mount But The Base Stays Loyal: Analysis*, ABC NEWS (Aug. 1, 2023, 8:34 p.m.), <https://abcnews.go.com/Politics/trumps-rivals-hope-voter-fatigue-legal-woes-mount/story?id=101681085> ("Prominent outside groups are among the most vocal in trying to push Republicans away from Trump, reflecting a sentiment more prevalent among deep-pocketed donors than rank-and-file voters." "Americans for Prosperity, the main political arm of the Koch brothers' network, is starting to spend a promised \$70 million to push for a GOP nominee other than Trump." "The only way Biden wins is if we nominate Trump again,' one early ad from the group states. 'The American people are ready to move on.'").
- Attached as Exhibit 8, Americans for Prosperity Action, *AFP Action Releases \$1 Million Ad Buy in Early Primary States Urging Voters to Move Beyond Biden and Trump*, AFP ACTION (Aug. 2, 2023), <https://afpaction.com/afp-action-releases-1-million-ad-buy-in-early-primary-states-urging-voters-to-move-beyond-biden-and-trump/> ("Today, Americans for Prosperity Action (AFP Action) [the main political arm of the Koch brothers' network] released two new ads urging voters to move on from Joe Biden and Donald Trump. The digital and connected TV ads will total \$1 million across the early primary states of Iowa, New Hampshire, South Carolina, and Nevada.").
- Attached as Exhibit 9, Laura Davidson & Gregory Korte, *Anti-Trump Republicans Are Actually Helping His 2024 Path by Scattering Their Cash*, BLOOMBERG (Aug. 3, 2023, 8:00 a.m.), <https://www.bloomberg.com/news/articles/2023-08-03/trump-s-2024-nomination-paved-by-donations-spread-over-12-republican-candidates> ("[B]illionaires Charles Koch and Susquehanna International Group's Jeffrey Yass, are giving to super PACs that are trying to unseat Trump as the frontrunner . . .").
- Attached as Exhibit 10, Tara Suter, *Republican Group Rips Trump in Fox News Ad Campaign: "He'll Do It Again"*, THE HILL (Aug. 4, 2023, 12:10 p.m.), <https://thehill.com/homenews/campaign/4137729-republican-group-rips-trump-in-fox-news-ad-campaign-hell-do-it-again/> ("The group, the Republican Accountability Project, said in a press release obtained by The Hill that it is going to air the ad in multiple states including Arizona and Wisconsin as well as on Fox News nationally "over the next week."").

- Attached as Exhibit 11, Statement from Trump Spokesperson on August 5, 2023, <https://www.donaldjtrump.com/news/111b9943-b9f4-4184-a51b-409d0171a1e8> (“The Truth post cited is the definition of political speech, and was in response to the RINO, China-loving, dishonest special interest groups and Super PACs, like the ones funded by the Koch brothers and the Club for No Growth.”).

Dated: June 26, 2024

Respectfully submitted,

/s/ Todd Blanche / Emil Bove

Todd Blanche (PHV)

toddblanche@blanchelaw.com

Emil Bove (PHV)

emil.bove@blanchelaw.com

Kendra L. Wharton (Fla. Bar No. 1048540)

k.wharton@whartonlawpllc.com

BLANCHE LAW PLLC

99 Wall Street, Suite 4460

New York, New York 10005

(212) 716-1250

/s/ Christopher M. Kise

Christopher M. Kise

Florida Bar No. 855545

ckise@continentalpllc.com

CONTINENTAL PLLC

255 Alhambra Circle, Suite 640

Coral Gables, Florida 33134

(305) 677-2707

Counsel for President Donald J. Trump

CERTIFICATE OF CONFERENCE

I hereby certify that on June 26, 2024, counsel for President Trump and the Special Counsel's Office conferred in a good faith effort regarding President Trump's request to respond to the additional evidence to be offered by the Office. After conferral, the Office offered the following statement:

"The Government opposes defendant Trump's request to file additional substantive briefing in connection with the Government's motion to modify Mr. Trump's bail conditions. The Court's minute order at ECF No. 643 directs that no additional briefing will be permitted, and no additional briefing is required for the Court to rule on the motion in light of the ample briefing it has already received and the additional evidentiary items submitted by the parties."

/s/ Kendra L. Wharton
Kendra L. Wharton

CERTIFICATE OF SERVICE

I, Kendra L. Wharton, certify that on June 26, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Kendra L. Wharton
Kendra L. Wharton